

# Exhibit F

**Fwd: FOR ATTORNEY'S AND CAPSICUM'S EYES ONLY - MEF Search Terms**

Seth Carson &lt;seth@dereksmithlaw.com&gt;

Tue 3/17/2020 1:54 PM

**To:** Alexi Michaels <amichaels@capsicumgroup.com> 1 attachments (104 KB)

Search Terms .pdf;

Get [Outlook for iOS](#)**From:** Barnes III, Attison <ABarnes@wiley.law>**Sent:** Tuesday, March 17, 2020 1:46:04 PM**To:** Seth Carson <seth@dereksmithlaw.com>**Cc:** Sidney Gold <sgold@discrimlaw.net>; Bill Rieser <brieser@discrimlaw.net>**Subject:** FOR ATTORNEY'S AND CAPSICUM'S EYES ONLY - MEF Search Terms

Seth –

Based on the commitments received from you and Capsicum this morning (regarding maintaining as “attorneys’ eyes only” all search terms and all information on your client’s devices, storage, and accounts), please see the attached search terms.

You will note that there are a few key general terms at the top of the list (“MEF” “Middle East Forum” etc.), but we also tried to be specific with names, e-mail addresses, document names, etc. so as to ensure that responsive data was captured and that it was captured in appropriate subsets. In other words, Capsicum will have a record of what data is responsive to which specific search terms, and this should also speed up any review done by your firm (fewer false positives) on the specific categories. Please have Capsicum retain a record of the number of hits for each term. Please also have Capsicum keep a record of what devices, storage media, cloud and other accounts were searched because we will all need clarity for the Court on whether Defendant has complied with the Court Order.

Please send me a reply e-mail to me at the same time you send these search terms to Capsicum, so I know they have been sent. I look forward to receipt of the data/metadata on Thursday in the format we previously agreed.



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